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U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT
BUREAU FOR ASIA AND THE NEAR EAST, WASHINGTON, DC 20523

SUPPLEMENTAL INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY DATA:

Country Code-AO: 383 – 009 A.O.

DO Name: Strengthened Partnership between the State and its Citizens to Establish a Foundation for Social Integration

Country or Region: Sri Lanka

Activity Name: Strengthening of Persons with Disabilities in Eastern and Southern Provinces of Sri Lanka

IEE Number: IDEA ODP DGP ND 2013 (02282013)

Reference: Office of Development Partners (ODP) – PIEE dated March 30, 2009 – See Attachment 1

Funding Begin: April, 2013

Funding End: March 2016

LOP Amount: \$892,000

IEE Prepared by:

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Date: March 5, 2012

SIEE Amendment (Y/N):

N

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Categorical Exclusion: ☒

Negative Determination: ☐

Negative Determination with Conditions: ☒

Positive Determination: ☐

☒

Deferral: ☐

Exemption: ☐

1. Background and Activity Description

Purpose and Scope of this SIEE. In accordance with 22 CFR 216, this SIEE reviews foreseeable environmental impacts of Navajeevana Rehabilitation Tangalle services for Persons With Disabilities (PWD) in the Eastern and Northern Provinces of Sri Lanka. On this basis, this SIEE sets out Threshold Decisions and mitigation measures.

This SIEE also sets out project-level implementation procedures intended to assure: (i) that conditions in this SIEE are translated into specific mitigation measures and actions; and (ii) systematic compliance with this SIEE during project and program implementation. These procedures are a general condition of approval for the SIEE, and their implementation is mandatory.

A Programmatic Initial Environmental Examination (PIEE) for the Office of Development Partners (ODP) Development Grants Program (dated 3/30/2009 – see Attachment 1) has been completed and approved with recommendations for categorical exclusion and negative determination with conditions. Per the PIEE, a Supplemental Initial Environmental Examination (SIEE) is required for this DGP award because it entails some specific activities such as production of prosthetic and orthotic devices in smaller scale recommended for ***Negative Determination with Conditions***. This grant also entails Community Based Rehabilitation (CBR) services and capacity building activities recommended for a ***Categorical Exclusion***; this activity is not covered under the PIEE but is addressed within the SIEE in accordance with 22 CFR 216(c)(2)(i) – “Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc)”.

Project Description. USAID/HA has identified the continuing and urgent need to address targeted humanitarian, psychosocial and disability assistance needs of vulnerable and war-affected displaced populations as a continuing and urgent priority in Sri Lanka. According to the Government of Sri Lanka’s (GoSL) Lessons Learned and Reconciliation Commission (LLRC), increased attention should be provided to those civilians who suffered most during the period of conflict. Even though the official statistics are not available with regard to the number of people with disabilities (PWDs) in the country it is estimated to be approximately 8%-10% of the population nationally. Due to the 30 year conflict in the North and East, however, the number of PWDs in these former conflict areas is much higher than the national average with some estimates as high as 15% in the former conflict region.

With the complexities of the needs such as physical, mental and other forms of disabilities, the lack of national assessment data and limited attention both by the government and donor agencies disability services remain the most challenging area to promote and expand in rural Sri Lanka. As a result, this has limited the access and improvement of quality disability-related services to PWDs in all parts of the country.

Navajeevana’s activity, “Strengthening of Persons with Disabilities in the Eastern and Southern Provinces in Sri Lanka” falls under Sub-Project Purpose 1 of the DGP PAD. Sub-Project Purpose 1 seeks to *Strengthen service providers treating and providing functional support to those affected by trauma and Persons with Disabilities*. Specifically, this activity will provide community based rehabilitation services for persons with disabilities and promote social inclusion through strengthening of disabled people’s organizations to address their needs and concerns within the community. This 36-month activity is planned to be implemented in Trincomalee, Batticaloa, Hambanthota and Matara districts with the objective to provide direct services to more than 5,500 PWDs and service providers in these respective district areas. In order to buttress the service provision, Navajeevana will partner with three local NGOs in the

Eastern Province while Navajeevana itself will deliver rehabilitation services in the Southern Province through mobile para-medical services for PWDs.

In line with the DGP Project Design log frame, this activity will provide the following output(s) under I.R. 1.3, Increased Stabilization of Conflict-Affected Communities:

- Provision of community-based rehabilitation through provision of prosthetic and orthotic services, training and social reintegration of PWDs in the former conflict affected areas and marginalized regions in the South
- Expand the availability of services through capacity building and promotion of disabled peoples organizations in the former conflict affected Eastern Province and promote and protect differently abled rights and services in the war torn areas.

2. Potential Adverse Environmental Impacts & Recommended Determinations, Including Conditions

For the purposes of this environmental review, the project goals are organized into three objectives and specific project activities are described in more detail below:

- Provide para-medical services to rehabilitate and enable 5000 disabled persons from Eastern & Southern Provinces to actively participate in socio economic mainstream development programs by the end of 2015.
- Train 100 pre-school teachers in Southern and Eastern Provinces on inclusive education and as a result, include at least 300 children with disabilities into mainstream pre-school system by 2015.
- Establish 10 new Disabled Peoples Organizations (DPOs) and strengthen 20 existing DPOs in five districts in the Eastern and Southern Provinces to participate in development interventions by the end of 2015.

An analysis of the potential adverse environmental impacts of each of these activities is provided in Table I.

Table 1: Potential Adverse Environmental Impacts

ACTIVITY	POTENTIAL ADVERSE IMPACTS
1) Provide para-medical services to rehabilitate and enable 5000 disabled person from Eastern & Southern Provinces to actively participate in socio economi	A large portion of this grant will focus on provision of Prosthetics and Orthotics (P&O) services to disabled clients including children in the South and East. The project is expected to produce artificial limbs and other orthotic devices using polypropylene material. The polypropylene will be imported from the International Committee of the Red Cross (ICRC) by

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mainstream development programs by the end of 2015	Navajeevana and used by a P&O center managed by Navajeevana, to assemble P&O devices on a needs basis, over a period of three years. The devices will be assembled in the P&O center and wastage will be minimal. Following assembly, left over material will be re-used to make other small components/parts of the devices; therefore, only small quantities of material will need to be disposed. With responsible manufacturing and disposal mechanisms in place, it is anticipated that this activity will have no significant impact on the environment, and thus conforms to a class of interventions eligible for Negative Determination with conditions (NDWC).
2) Train 100 pre-school teachers in Southern and Eastern Provinces on inclusive education and as a result, include at least 300 children with disabilities into mainstream pre-school system by 2015.	This activity involves technical assistance and capacity building with no foreseeable adverse impact on the environment. It conforms to a class of interventions normally eligible for categorical exclusion (CE)
3) Establish 10 new DPOs and strengthen 20 existing DPOs in five districts in the Eastern and Southern Provinces to participate in development interventions by the end of 2015.	This activity involves technical assistance and institutional capacity building, with no foreseeable adverse impact on the environment. It conforms to a class of interventions normally eligible for categorical exclusion (CE)

Pursuant to the above analysis, the following threshold determinations, and conditions if applicable, are recommended for the project activities:

Table 2: Recommended Determinations and Conditions

ACTIVITY TYPE	RECOMMENDED DETERMINATION AND CONDITIONS
1) Provide para-medical services to rehabilitate and enable 5000 disabled persons	<p>Pursuant to 22 CFR 216.3 (a)(2)(iii), a ND is recommended for Activity 1, subject to the following conditions:</p> <ul style="list-style-type: none"> The implementing partner adheres to the environmental screening process and implements the Environmental Mitigation and

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<p>from Eastern & Southern Provinces to actively participate in socio economic mainstream development programs by the end of 2015</p>	<p>Monitoring Plan (EMMP).</p> <ul style="list-style-type: none"> • The P&O Center has the relevant local permits/authorization to manufacture P&O devices and has proper manufacturing processes and equipment in place to ensure a safe working environment (proper ventilation, safety procedures etc.) for the center workers • The P&O Center strives to adhere to international manufacturing guidelines to manufacture safe and comfortable P&O devices and provide training to recipient PWDs on its proper use and maintenance. (http://www.icrc.org/eng/resources/documents/publication/p0868.htm) • The P&O Center will properly dispose of any waste created by the manufacture of P&O devices, in accordance with local environmental regulations. • Good practices: The P&O Center will emphasize and integrate environmentally sound practices consistent with Chapter 15 (Solid Waste: Generation, Handling, Treatment and Disposal) of the USAID Environmental Guidelines for Small-scale Activities (http://www.encapafrika.org/EGSSAA/solidwaste.pdf)
<p>2) Train 100 pre-school teachers in Southern and Eastern Provinces on inclusive education and as a result, include at least 300 children with disabilities into mainstream pre-school system by 2015.</p>	<p>Activity 2 is recommended for Categorical Exclusion pursuant to 22 CFR 216(c)(2)(i) – “education, technical assistance or training programs”</p>
<p>3) Establish 10 new DPOs and strengthen 20 existing DPOs in five districts in the Eastern and Southern Provinces to participate in development</p>	<p>Activity 2 is recommended for Categorical Exclusion pursuant to 22 CFR 216(c)(2)(i) – “education, technical assistance or training programs”</p>

interventions by the end of 2015.	
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3. Implementation and Monitoring Requirements

In addition to the specific conditions enumerated in Table 2 above, the negative determinations recommended in this SIEE are contingent on full implementation of the following general monitoring and implementation requirements:

- 1. IP Briefings on Environmental Compliance Responsibilities.** The AOR shall provide Navajeevana with a copy of this SIEE and brief them on environmental compliance responsibilities. All approved environmental conditions from this SIEE shall be translated into RFP/RFA & ultimately contract/award/agreement, becoming binding and AOR/MEO should explain these to implementer at the "post award conference."
- 2. Development of EMMP.** Navajeevana shall develop and provide for AOR review and approval an Environmental Mitigation and Monitoring Plan (EMMP) (see Attachment 2 for sample format) documenting how the project will implement and verify all SIEE conditions. The EMMP shall be reviewed and re-submitted for approval to USAID annually.
- 3. Integration and implementation of EMMP.** Navajeevana shall integrate the EMMP into its project work plan and budgets, implement the EMMP and report on its implementation as an element of regular project performance reporting.
- 4. Reporting.** Navajeevana periodically reports to USAID will include a brief update on mitigation and monitoring measures and procedures being implemented, results of environmental monitoring, and major modifications/revisions in the development activities. The AOR will compile the reports into an overall DGP report for the ODP Bureau Environmental Officer (BEO) so the results can be included in the Operational Plan reporting process to Congress. Navajeevana should consider, based on resources available, appointing staff with expertise and experience to manage such activities and advise Navajeevana on environmental issues.
- 5. Oversight.** The AOR and on-site managers of activities under this award in consultation with the Mission Environmental Officers will undertake field visits and consultations with implementing partners to jointly assess the environmental impacts of ongoing activities and associated mitigation and monitoring conditions.
- 6. Contracting Requirements.** USAID mission procurements should include consideration of the offeror's ability to perform mandatory environmental compliance requirements as envisioned under the DGP award. The CO shall include required environmental compliance and reporting language into each implementation instrument and ensure that appropriate resources (budget), qualified staff, equipment and reporting procedures are dedicated to this portion of the project.

7. **Host Country Laws.** Implementation will in all cases adhere to applicable host country environmental laws and policies and international environmental obligations under relevant ratified conventions and agreements (see Attachments 3 and 4).
8. **Basis, Approval and Scope.** The EMMP should be based on analysis of site specific information and the nature of activities to be presented in an Environmental Screening Form/Review Report (EDF/RR). Both EDF/RR and EMMP shall be approved by the AOR and MEO. The EMMP should be commensurate with the scope and nature of potential adverse environmental and social impacts, using a "common sense" approach to the Mission's manageable interest.
9. **Consider Green Meetings.** When conducting meetings, conferences, training the project will consider green procurement concepts to eliminate, reduce, or recycle waste as summarized in the "Green Meeting" checklist as noted in Attachment 5.

Limitations of the SIEE

This is the SIEE for the project. Actual activities are yet to be fully designed. Nor has the project commenced. Therefore, as with all USAID-funded programs, and pursuant to 22 CFR 216.3(a)(9), as planning for start-up commences and information becomes available the threshold examination for those activities will be reviewed and possibly revised by the MEO.

This assistance does not cover activities involving:

1. Assistance, procurement and/or use of genetically modified organisms (GMO) requiring biosafety assessment/analysis under with ADS 201.3.12.2(b);
2. Development Credit Authority (DCA) or Global Development Alliance (GDA) programs;
3. Procurement and/or use of asbestos-containing materials, polychlorinated biphenyls (PCBs) and/or any other toxic/hazardous materials prohibited by U.S. EPA and/or under relevant international environmental conventions and agreements;
4. Actions that are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere.
5. Procurement and use of pesticides.

Revisions. The AOR, in consultation with the mission activity managers and implementing partners, as well as the MEO, REA and BEO as appropriate, shall actively monitor and evaluate whether unforeseen environmental consequences arise during implementation, and shall modify or terminate activities as appropriate. If activities arise not described in this document, an amended PIEE shall be prepared and cleared by the ODP BEO.

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APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS:

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CLEARANCE:

HIA Director

Approval:

Adrian Schmidt

3/7/2013
Date

Deputy Mission Environmental Officer

Approval:

Nihani Rishi

3/7/2013
Date

Regional Environmental Officer

Approval:

concur by email
Andrei Harnamik

3/6/2013
Date

Mission Director

Approval:

James Bedner

3/7/2013
Date

CONCURRENCE:

Bureau Environmental Officer

ODP/DGP

Dennis Durbin

Date:

3/14/2013

Approved:

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Disapproved:

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ATTACHMENTS:

Attachment 1 – Reference Document: ODP/DGP PEE 3/30/2009

Attachment 2 – Environmental Mitigation and Monitoring Report (EMMR) Format

Attachment 3 – Sri Lanka Environment Context Laws

Attachment 4 – Sri Lanka Environment General Background

Attachment 5 – Green Meeting Planning Checklist: Setting Environmental Priorities

CC-ED:

A/COR Project Files

MPO Mission 22 CFR 216 Tracking System

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